From: Deb T
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:23:45 PM
Attachments: image.png

I strongly oppose OGE's proposed legal expense fund regulation as currently drafted.

To: ContactOGE@oge.gov

Re: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)

I strongly oppose OGE's proposed legal expense fund regulation as currently drafted.
OGE should:

.. First, and foremost - Remove the exception that makes compliance optional. Compliance with ethics rules should never be "optional." An optional rule isn't worth the paper it's written on.

.. Treat nonprofit charities (501(c)(3) organizations) the same as law firms by allowing them to hire legal counsel for whistleblowers.

.. Replace the proposed recusal requirement with, at a minimum, a 5-year recusal that prevents donors of gifts from influencing, in any manner, decisions, policies, or regulations that would affect them, their families, or the companies or industries in which they have substantial interests;

.. Remove the example re: an accused sexual harasser;

D. Todd
(Address omitted to protect sender)
dtsjnk@gmail.com